

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS and LAWYERS FOR
CIVIL RIGHTS,

Plaintiffs,

V.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, IMMIGRATION
AND CUSTOMS ENFORCEMENT,

Defendants.

C.A. No. 19-12564-MBB

JOINT STATUS REPORT

The government completed its production on March 15, 2021. The parties are in the process of meeting and conferring and believe that we can significantly narrow the scope of the issues on summary judgment. The parties request a modest extension of the current summary judgment briefing schedule to do so. A proposed order outlining the prior and amended, proposed deadlines is attached as **Exhibit A**.

Date: April 4, 2021

Respectfully Submitted,

/s/ Lauren Godles Milgroom
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing will be filed through the electronic filing system of the Court, which system will serve counsel of record, on April 4, 2021.

/s/ Lauren Godles Milgroom
Lauren Godles Milgroom